

## **IOWA COLLEGE STUDENT AID COMMISSION**

### **William Penn University Voluntary Application for Postsecondary Registration in Iowa April 27, 2016**

#### **STAFF ACTION:**

***Approve William Penn University's voluntary application for postsecondary registration in Iowa for a two-year term that begins on April 27, 2016 and ends on April 27, 2018.***

#### **Registration Purpose**

William Penn University (WPU or "the University") lawfully operates a postsecondary, degree-granting institution in Iowa under an exemption from registration in Iowa Code §261B.11(1)(j): "Higher education institutions that meet the criteria established under §261.9(1)." The criteria referenced in Iowa Code §261.9(1), establish institutional eligibility for the Iowa Tuition Grant Program. WPU meets the Iowa Tuition Grant Program institutional eligibility criteria. Whether an institution actually awards funds from this state grant program is irrelevant. Thus, WPU is not required to seek the explicit approval of the State of Iowa in order to lawfully offer postsecondary degree programs in Iowa. For the purpose of the federal Department of Education's rules in 34 CFR §600.9 that require federal student aid participating schools to be authorized by an action of the State in which the school is located, WPU is listed in Iowa Administrative Code 281-Chapter 21, by name, as a private nonprofit, degree-granting postsecondary educational institution that lawfully operates in Iowa.

However, WPU has elected, voluntarily, to seek official designation by the Iowa University Student Aid Commission as a registered school under Iowa Code Chapter 261B and associated rules in Iowa Administrative Code 281-Chapter 21 that are in effect as of the date of this report.

#### **Institutional Information**

WPU is a private, non-profit postsecondary institution that provides instruction via face-to-face and distance education delivery modalities from its main campus located at: 201 Trueblood Avenue, Oskaloosa, IA 52577. The University's chief executive officer is WPU President John E.E. Ottosson at the same address. The designated Iowa contact person for WPU is Linda Parker, Vice President for College for Working Adults, also at the same address. The Iowa Secretary of State records an active, domestic non-profit corporation registration # 87586. The registered agent is Bonnie L. Johnson also at the institutional address.

*Physical facilities:* The WPU campus contains adequate physical facilities for its residential program. Among its major buildings are:

- Penn Hall

- Penn Activity Center (PAC)
- Dana M. Atkins Memorial Union
- Musco Technology Center (MTC)
- Edwin McGrew Fine Arts Center
- Ron Randleman Fitness Center
- Athletic Facilities
- Spencer Memorial Chapel
- Residence Halls
- Cafeteria & PAC Café
- Wilcox Library
- Indian Hills Community Center

A map of the campus is available online at: <http://www.virtualrabbit.com/search.htm?q=&what=William+Penn+University> and [http://www.wmpenn.edu/Student\\_Life/Facilities/Facilities/](http://www.wmpenn.edu/Student_Life/Facilities/Facilities/) includes a link for interactive campus tours.

*Instructional Methodology:* WPU offers courses and programs via in-person instruction, distance education, and hybrid programs utilizing both face-to-face instruction and online instruction.

Both distance and residential courses use the learning management system Moodle for classroom content. This includes discussion forums as well as drop boxes for assignments. Adobe Connect is used for some class discussion as well. The faculty employ several techniques to get materials to students including videos containing lecture materials, PowerPoint presentations, open and closed forums, and emails. Additionally, the University uses a new technology in which students can choose to be at multiple sites or online.

*Accreditation:* WPU is accredited by the Higher Learning Commission, a regional accrediting agency recognized by the federal Department of Education. In addition, WPU has programmatic accreditation from the following entities:

- The Iowa Department of Education approves the elementary and secondary education programs.
- The Commission on Collegiate Nursing Education accredits the R.N.–B.S.N. program and it is approved by the Iowa Board of Nursing.

*Federal Stafford Loan Cohort Default Rate:* The most recent official data from the federal Department of Education has determined WPU's federal Stafford Loan default rate for fiscal year 2012 at 15.8%. The national average default rate of all schools during that time is 11.8%.

*Graduation Rate* (the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion as reported to the federal Department of Education): WPU reports a graduation rate of 38%.

*Average Loan Debt upon Graduation:* WPU provided average loan debt upon graduation with a baccalaureate degree is \$28,467.

*Record Preservation:* WPU's current student records (beginning in the 1980s) are stored electronically in two primary systems: Jenzabar CX Student Information System (SIS) and Moodle. Online data available directly in the SIS and Moodle are held in the primary WPU data center on storage area network devices where a component splits up data across drives to increase performance backed up by a secondary component that can be placed into service immediately if the primary component fails. The secondary component data center contains equipment capable of running the university at a reduced service level should a disaster wipe out the primary data center. Additionally, electronic student records are backed up to tape each night and are held offsite in a secured location. Tapes are held for 6-8 months before being recycled.

*Transcript Requests:* Any current or former student wishing to obtain a transcript may do so by contacting:

- ✓ Registrar's Office  
Penn Hall, Room 217  
201 Trueblood Avenue  
Oskaloosa, Iowa 52577  
[registrar@wmpenn.edu](mailto:registrar@wmpenn.edu)
- ✓ Information is available at: [http://www.wmpenn.edu/Alumni/Transcript\\_Request/](http://www.wmpenn.edu/Alumni/Transcript_Request/).

*Student Learning Resources:* WPU has implanted a Student Success Center as a student resource designed to encourage independent learning. Student tutors are available at no cost to help all students study for an upcoming test, write a research paper, or assist with an important presentation. Tutoring is available for education students via phone, e-mail, or face-to-face. Distance education students can utilize the tutors in the evenings Sunday through Wednesday via online or phone. Help is available for most subjects with emphasis on writing, math and computer skills.

- ✓ [http://www.wmpenn.edu/Academics/Student\\_Success\\_Center/](http://www.wmpenn.edu/Academics/Student_Success_Center/).

Distance education students have access to the library's online resources. Available are a listing of journals, magazine and newspapers article resources, and eBooks, Students may utilize Ask a Librarian during chat hours or email a librarian outside of chat hours.

- ✓ <http://wmpenn.beta.libguides.com/library>.

On ground and distance education students can utilize the free counseling services available to all students. The services include individual or group counseling.

- ✓ [http://www.wmpenn.edu/Student\\_Life/Counseling\\_Center/](http://www.wmpenn.edu/Student_Life/Counseling_Center/).

WPU offers the opportunity for students and alumni to participate in a Career Mentoring Program. The program matches students with a mentor with work experience to help set and achieve career goals. The communication between mentor and mentee can be

in-person or other communication depending on the preferences of the participants. This service is available to both online and on-ground students.

- ✓ [http://www.wmpenn.edu/Alumni/Mentoring\\_Program/Career\\_Mentoring\\_FAQs/](http://www.wmpenn.edu/Alumni/Mentoring_Program/Career_Mentoring_FAQs/).

WPU offers Career Services supports distance and on-ground students as they transition to the workplace or advanced degrees as they pursue new careers, advancement in their current positions, or professional development. Career exploration opportunities such as job shadowing and internship programs, part-time jobs during the school year and summers are available, and help with job placement as students near graduation.

- ✓ [http://www.wmpenn.edu/Alumni/Career\\_Services/Career\\_Services/](http://www.wmpenn.edu/Alumni/Career_Services/Career_Services/).

*Curriculum Evaluation and Development:* Each faculty member meets prior to course development with the appropriate division chair and the curriculum coordinator. Faculty writes the course according to University structure and templates. The coursework is overseen by the division chair and the curriculum coordinator. Embedded in each course is an assessment for student learning.

### **Programs Offered Under Registration**

*(Note: The programs listed below are only those for which William Penn University may need coverage under the State Authorization Reciprocity Agreement (SARA) policies and rules. However, William Penn University's registration authorization to operate at a location in Iowa is at the institutional level; thus, the Commission authorizes the institution to offer all of its programs in Iowa).*

The estimated total charge for tuition, fees, books, and supplies applicable to each program is listed below.

### Residential Programs Offered at the WPU campus in Oskaloosa, Iowa

#### *Baccalaureate Programs*

- Bachelor programs with majors in – Accounting, Biology, Business Management, Communications, Computer Science, Education, Exercise Science, History and Government, Human Services, Kinesiology, Information Technology, Industrial Management, Industrial Technology, Software Engineering, Mechanical Engineering, Mathematics, Music, Nursing, Psychology, Sociology, Sport and Recreation Management - \$ 121,896.

### Distance Education Programs

#### *Baccalaureate Programs (Online format)*

- Bachelor programs with majors in – Accounting, Biology, Business Management, Communications, Computer Science, Education, Exercise Science, History and Government, Human Services, Kinesiology, Information Technology, Industrial Management, Industrial Technology, Software Engineering, Mechanical Engineering, Mathematics, Music, Nursing, Psychology, Sociology, Sport and Recreation Management - \$57,125.

## Field Experiences

Structured field experiences are a required part of the curriculum for the following programs:

- **Elementary and Secondary Education:** WPU Education programs require a number of field experiences and opportunities to work with students and teachers in local schools. The student teaching experience at WPU meets state licensure requirements for initial licensure because it includes a full-time experience for a minimum of 14 consecutive weeks during the student's final year of the practitioner preparation program. Student teaching can be completed at schools in the region or elsewhere in the U.S.
- **RN-BSN:** More than 150 hours of clinical experience are spent in a variety of hospitals, medical centers and community-based health settings. Clinical hours can be completed at schools in the region or elsewhere in the U.S.
- **Baccalaureate Capstone Practicum:** The capstone is required for Social and Behavioral sciences and several of the other baccalaureate programs. The capstone requires students to participate in field experience in their program and allows students to integrate the knowledge and skills they have obtained in their program study. This course can be taken regionally or elsewhere in the U.S.

## **Registration Compliance**

As required by Iowa Code §261B.4, WPU disclosed its policy on refunding tuition charges students who fail to complete the enrollment period for which they were charged. The policy is found in the WPU catalog on the website at:

- ✓ [http://www.wmpenn.edu/uploadedFiles/wmpennedu/Academics/Course\\_Catalog\\_2015-2016.pdf](http://www.wmpenn.edu/uploadedFiles/wmpennedu/Academics/Course_Catalog_2015-2016.pdf) at 23.

Administrative rules specifically require the school to comply with the requirements of Chapter §261.9(1) "e" through "h" by implementing the following policies.

- Iowa Code §261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code §261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. William Penn University provided compliant policies that address both of these requirements. These policies are disclosed to students in the WPU Student Handbook and to prospective students and the public on the University's website at the following locations:
  - ✓ [http://www.wmpenn.edu/uploadedFiles/wmpennedu/Student\\_Life/Student\\_Handbook\\_6-9-15.pdf](http://www.wmpenn.edu/uploadedFiles/wmpennedu/Student_Life/Student_Handbook_6-9-15.pdf) at 32 and 37.
  - ✓ [http://www.wmpenn.edu/uploadedFiles/wmpennedu/Student\\_Life/2014\\_Security\\_Report.pdf](http://www.wmpenn.edu/uploadedFiles/wmpennedu/Student_Life/2014_Security_Report.pdf) at 2-4.
- Iowa Code §261.9(1)(g) requires a school to maintain a special policy concerning institutional charges for members of the Iowa National Guard or reserve members of

the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. WPU provided a policy that is compliant with this requirement and will disclose the policy to students through the University's Financial Aid webpage.

✓ [http://www.wmpenn.edu/Admissions/Financial\\_Aid/2015%E2%80%932016\\_Financial\\_Aid\\_Guide/#13\\_Drop\\_Course-Withdraw](http://www.wmpenn.edu/Admissions/Financial_Aid/2015%E2%80%932016_Financial_Aid_Guide/#13_Drop_Course-Withdraw).

- Iowa Code §261.9(1)(h) requires a school to develop and implement a policy for employees who, in the course of their employment, attend, examine, counsel, or treat a child and who suspect the physical or sexual abuse of that child. WPU provided a compliant policy to staff as part of its registration application. WPU discloses the policy to employees at hire in the Faculty/Staff Handbook that contains the policies of the university relative to campus security

*Student Consumer Information:* In its registration application, the University affirms its willingness to comply with the requirements of Iowa Code §261.9, as stipulated by Iowa Code §261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies; whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are in place and available to students through WPU's undergraduate and graduate student handbooks, which is available to students through the University's webpage and various other readily accessible University web pages, including those that address each specific WPU program.

✓ [http://www.wmpenn.edu/uploadedFiles/wmpennedu/Academics/Course\\_Catalog\\_2015-2016.pdf](http://www.wmpenn.edu/uploadedFiles/wmpennedu/Academics/Course_Catalog_2015-2016.pdf).

✓ [http://www.wmpenn.edu/Admissions/Tuition\\_and\\_Fees/](http://www.wmpenn.edu/Admissions/Tuition_and_Fees/).

Iowa Code §261B.7 states that, while a school must not represent that it is "approved" or "accredited" by the Commission or the State of Iowa, a registered school must disclose that the school is registered by the Commission on behalf of the state of Iowa and provide the Commission's contact information for students who wish to inquire about the school or file a complaint. The University currently discloses the Commission's contact information for student complaint purposes and provides a direct link to the Commission's constituent complaint form.

✓ <http://www.wmpenn.edu/content.aspx?id=2790&terms=commission>.

*Financial Responsibility:* WPU submitted the audit report of an independent accounting firm TD&T CPAs and Advisors, P.C. dated January 15, 2016, covering the institution's financial position through June 30, 2015. The accounting firm stated its opinion that the school's financial statements present fairly, in all material respects, the school's financial position.

A private non-profit school that participates in the federal student aid programs must maintain a composite score, based on a three-factor financial responsibility ratio, of at least 1.5 in order to be determined by the federal Department of Education to be financially responsible without additional oversight. WPU's independent auditor did not report nor test WPU's financial responsibility composite score. The most recent financial responsibility composite score reported for WPU by the federal Department of Education is for the institutional fiscal year ending June 30, 2014, when WPU's composite score was 1.8 (out of a possible 3.0).

*Full-Time Iowa Resident Faculty Member or Program Coordinator.* WPU employs 40 full-time, Iowa-based faculty members. Additional information about faculty appears below.

*Instructional/Supervisory Staff Qualifications:* WPU maintains easily accessible information about faculty on each of its web-based program main pages. A sampling of faculty qualifications is listed below.

- Business Administration programs: Of four faculty members reviewed two have doctoral degrees and all have graduate degrees.
- Education programs: Of five faculty members reviewed one has a doctoral degree in education and all have graduate degrees.
- Human Services program: Of three faculty members reviewed all have doctoral degrees.
- Nursing programs: Of four faculty members reviewed one has a doctoral degree, all have master degrees in nursing, three are Registered Nurses and one is a Certified Nurse Midwife.

*Commitment to Iowa Students and Teach-Out.* By executing an electronic signature on the registration application, WPU President John Ottosson committed to the delivery of programs WPU offers and agreed to provide alternatives for students to complete programs at WPU or another school if the University closes a program, or closes before students have completed their courses of study.

## **Compliance with Iowa Code Chapter 714**

*§714.18 – Evidence of Financial Responsibility:* WPU is exempt from the financial responsibility (i.e., bonding) requirements of Iowa Code §714.18. The University qualifies for the following exemption listed in Iowa Code §714.19, subsection 10: "Private nonprofit schools that meet the criteria established under Iowa Code §261.9(1). The criteria established under Iowa Code §261.9(1), is the *institutional* eligibility criteria that qualifies a school for participation in the Iowa Tuition Grant program. WPU meets the institutional eligibility criteria, and therefore qualifies for the financial responsibility

exemption. For this purpose, whether a school actually awards funds from the Iowa Tuition Grant program is immaterial.

§714.23 – *State Tuition Refund Policy*: The Iowa tuition refund policy does not apply to WPU because it is a private nonprofit institution.

### **Compliance with Iowa Code Chapter 261F**

WPU posts on its website a Code of Conduct for Educational Loans <http://www.wmpenn.edu/content.aspx?id=78&terms=educational%20code%20of%20conduct> (which includes a link to a more detailed policy) that addresses provisions of Iowa Code Chapter 261F. WPU's Code of Conduct appears to be an accurate and comprehensive reflection of Iowa Code provisions that govern certain aspects of business relationships between private education loan lenders and school personnel who have responsibilities related to education loans. WPU does not provide information on private loans on its website and upon directs students to independently find and secure any necessary private funding. Staff finds no evidence that the school participates in any preferred lender arrangement or otherwise refers its enrolled students to any specific private education loan lender.